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10 SUNOCO, INC.

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13 CENTRAL VALLEY REGIONAL WATER QUALITY CONTROL BOARD  
14 STATE OF CALIFORNIA  
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16 In the Matter of:

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18 RECONSIDERATION OF CLEANUP AND  
19 ABATEMENT ORDER R5-2013-0701, MOUNT  
20 DIABLO MINE, CONTRA COSTA COUNTY,  
21 DATED APRIL 16, 2013

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**SUNOCO, INC.'S COMMENTS ON  
PROPOSED REVISIONS TO CAO**

Hearing Date: October 10, 2014

18 Sunoco, Inc. ("Sunoco") submits its Comments on the Proposed Revisions to CAO R5-  
19 2013-0701 ("CAO"), pursuant to the Central Valley Regional Water Quality Control Board's  
20 ("Regional Board") Hearing Procedures issued on August 19, 2014. The hearing in this matter is  
21 scheduled for October 10, 2014.  
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1 **COMMENTS**


2 Sunoco objects to the additional language added to paragraph 17 of the Revised CAO.  
3 Sunoco's objections are thoroughly described and set forth in Sunoco's numerous submissions in  
4 the above captioned matter, including its: original Comments Regarding the CAO; Hearing  
5 Brief; Reply Brief re: de facto merger; and Rebuttal Brief re: assumption of liability, and all  
6 attachments thereto (collectively "Comments and Briefs"). Sunoco hereby incorporates by  
7 reference its Comments and Briefs as if fully set forth herein and applicable to the Proposed  
8 Revisions to the CAO presented by the Prosecution Team on or about August 22, 2014.

9 The additional language added to paragraph 18 of the Revised CAO represents a legal  
10 conclusion adopted by the Prosecution Team to which Sunoco does not have sufficient  
11 knowledge or information to refute at this time.

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13 Respectfully submitted,

14 DATED: September 12, 2014

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18 By: 

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